

Exhibit 1

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA } Cause No. CV 20-52-BLG-SPW
MAPLEY, }
Plaintiffs, }
vs. }
WATCHTOWER BIBLE AND }
TRACT SOCIETY OF NEW YORK, }
INC., WATCH TOWER BIBLE AND }
TRACT SOCIETY OF }
PENNSYLVANIA, and BRUCE }
MAPLEY SR., }
Defendants. }
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**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S RESPONSES
TO PLAINTIFFS' THIRD SET OF
JURISDICTIONAL DISCOVERY**

WATCHTOWER BIBLE AND)
TRACT SOCIETY OF NEW YORK,)
INC.)
Cross-Claimant,)
vs.)
BRUCE MAPLEY SR.,)
Cross-Claim Defendant.)
ARIANE ROWLAND, and JAMIE)
SCHULZE,) Cause No. CV 20-59-BLG-SPW
Plaintiffs,)
vs.)
WATCHTOWER BIBLE AND)
TRACT SOCIETY OF NEW YORK,)
INC., WATCH TOWER BIBLE AND)
TRACT SOCIETY OF)
PENNSYLVANIA, and BRUCE)
MAPLEY SR.,)
Defendants.)

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S RESPONSES
TO PLAINTIFFS' THIRD SET OF
JURISDICTIONAL DISCOVERY**

TO: Plaintiffs and their counsel, Robert L. Stepans, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA"), by and through its attorneys, and responds to Plaintiffs' Third Set of Jurisdictional Discovery to Defendant WTPA as follows:

Production is improper. WTPA stands on its objection in that the entirety of the request is outside the scope and time-period permitted by the Court's discovery order.

REQUEST FOR PRODUCTION NO. 75: Please produce a copy of the publication entitled "*Organization For Kingdom-Preaching and Disciple-Making*".

RESPONSE: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Request for Production is improper. WTPA stands on its objection in that the entirety of the request is outside the scope and time-period permitted by the Court's discovery order.

REQUEST FOR PRODUCTION NO. 76: Please produce a copy of the publication entitled "*Organization For Kingdom-Preaching and Disciple-Making*".

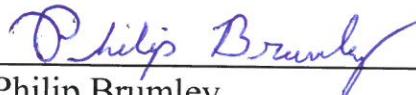
RESPONSE: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Request for Production is improper. WTPA stands on its objection in that the entirety of the request is outside the scope and time-period permitted by the Court's discovery order.

REQUEST FOR PRODUCTION NO. 76: Please produce a copy of the following publications:

- Zion's Watch Tower and Herald of Christ's Presence, January 1885 issue.
- Zion's Watch Tower, August 1, 1895.

VERIFICATION

Philip Brumley states that he has read the foregoing (*Defendant WTPA's Responses to Plaintiffs' Third Set of Jurisdictional Discovery*) and knows the contents thereof; that said answers were prepared with the assistance and advice of counsel; that the answers set forth herein, subject to inadvertent or undisclosed errors, are necessarily limited by the records and information still in existence presently recollected and thus far discovered in the course of the preparation of all answers. Consequently, he reserves the right to make any changes to the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; and that subject to the limitations set forth herein, the answers are true to the best of his knowledge, information and belief.


Philip Brumley

Dated: March 8, 2021

CERTIFICATE OF SERVICE

I hereby certify that, on March 8th, 2021, a copy of the foregoing (*Defendant WTPA's Responses to Plaintiffs' Third Set of Jurisdictional Discovery*) was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepans
Ryan R. Shaffer
James C. Murnion
MEYER, SHAFFER & STEPANS, PLLP
430 Ryman Street
Missoula, MT 59802
3. Bruce G. Mapley Sr.
3905 Caylan Cove
Birmingham, AL 35215

by the following means:

CM/ECF
 Hand Delivery
2-3 U.S. Mail

Fax
2 E-Mail
 Overnight Delivery Services

By: 

Guy W. Rogers / Jon A. Wilson /
Aaron M. Dunn
BROWN LAW FIRM, P.C.
*Attorneys for Defendants Watchtower
Bible and Tract Society of New York,
Inc., and Watch Tower Bible and
Tract Society of Pennsylvania*